

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**THE HURRY FAMILY REVOCABLE TRUST
ALPINE SECURITIES CORPORATION; and
SCOTTSDALE CAPITAL ADVISORS
CORPORATION**

Plaintiffs,

VS.

CHRISTOPHER FRANKEL

Defendant.

Case No. 1:19-mc-00498-AT

(M.D. Fla. Case No. 8:18-cv-02869)

**STIPULATION TO TRANSFER ACTION TO THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT OF FLORIDA**

Plaintiffs The Hurry Family Revocable Trust, Alpine Securities Corporation, and
Scottsdale Capital Advisors (collectively, “Plaintiffs”) and third party Vision Financial Markets,
LLC (“Vision”) hereby jointly agree and stipulate as follows:

WHEREAS, on June 7, 2019, Plaintiffs served Vision with a subpoena for the production of documents issued by the U.S. District Court for the Middle District of Florida (the “Subpoena”), where the underlying case is pending;

WHEREAS, the Subpoena commanded production of documents in this district;

WHEREAS, Plaintiffs commenced this action in order to compel Vision's compliance with the Subpoena;

WHEREAS, on November 8, 2019, Vision filed a Motion to Transfer pursuant to Fed. R. Civ. P. 45(f) and For Extension of Time to Respond to Plaintiffs' Motion to Compel;

WHEREAS, transfer under section 1404(a) can be made “to any district or division to which all parties have consented.” 28 U.S.C. § 1404(a);

WHEREAS, after conferring, all Parties agree and consent to the transfer of this action to the U.S. District Court for the Middle District of Florida;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their counsel of record, that:

1. This action shall be transferred to the U.S. District Court for the Middle District of Florida.

2. Vision’s deadline to respond Plaintiffs’ Motion to Compel shall be the later of: two weeks after this action is transferred to the U.S. District Court for the Middle District of Florida; or December 13, 2019.

3. Neither this Stipulation, nor the parties’ consent to transfer, shall be construed as a waiver of any legal or factual argument or position relating to this case.

IT IS SO STIPULATED.

Dated: November 22, 2019

Respectfully submitted,

By: /s/ Charles Harder
Charles J. Harder, Esq.
Jordan Susman, Esq.
HARDER LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, California 90212
Tel. (424) 203-1600

By: /s/ Anthony Harwood
Anthony J. Harwood, Esq.
HARDER LLP
260 Madison Avenue, Sixteenth Floor
New York, NY 10016
Tel. (212) 799-1400

Counsel for Plaintiffs

By: /s/ Jenny R. Chou

Jenny R. Chou

Wiggin and Dana LLP

One Century Tower

P.O. Box 1832

New Haven, CT 06508-1832

Tel: 203-498-4302

Fax: 203-782-2889

jchou@wiggin.com

Counsel for Vision Financial Markets, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 22, 2019, the foregoing document was filed with the Court's CM/ECF system, which will send electronic notice to all counsel of record.

/s/ Charles J. Harder

Attorney

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**THE HURRY FAMILY REVOCABLE TRUST
ALPINE SECURITIES CORPORATION; and
SCOTTSDALE CAPITAL ADVISORS
CORPORATION**

Plaintiffs,

VS.

CHRISTOPHER FRANKEL

Defendant.

Case No. 1:19-mc-00498-AT

(M.D. Fla. Case No. 8:18-cv-02869)

[PROPOSED] ORDER RE STIPULATION TO TRANSFER ACTION TO THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA

Upon consideration of Plaintiffs The Hurry Family Revocable Trust, Alpine Securities Corporation, and Scottsdale Capital Advisors (collectively, “Plaintiffs”) and third party Vision Financial Markets, LLC’s (“Vision”) Stipulation to Transfer Action to the U.S. District Court for the Middle District of Florida, the Court’s records and files of the case, and for good cause shown, the Court hereby orders as follows:

1. The Stipulation is GRANTED;
2. This action shall be transferred to the U.S. District Court for the Middle District of Florida.
3. Vision's deadline to respond Plaintiffs' Motion to Compel shall be the later of:
two weeks after this action is transferred to the U.S. District Court for the Middle District of Florida; or December 13, 2019.

4. Nothing in this Order, the parties' Stipulation, or the fact of the parties' consent to transfer, shall be construed as a waiver of any legal or factual argument or position relating to this case.

IT IS SO ORDERED.

Dated: November 22, 2019

United States District Judge